## UNITED STATES DISTRICT COURT EASTERN DISTRICT OF PENNSYLVANIA

## JAMES EVERETT SHELTON

Plaintiff

-against-

TARGET ADVANCE, LLC

Defendants

Civil Action No. 2:18-cv-02070-NIQA

NOTICE OF MOTION TO DISMISS AMENDED COMPLAINT

Please note the appearance of Norman M. Valz, of the Law Office of Norman M. Valz, as counsel of record for Defendant, Target Advance, LLC hereby files this Motion to Dismiss Plaintiff's Claims with prejudice.

Philadelphia, Pennsylvania

Respectfully Submitted,

October 5, 2018

Norman M. Valz, Esq.– Attorney for Movant Law Office of Norman M. Valz, P.C. PA I.D. No. 61338 205 Arch Street – 2<sup>nd</sup> Floor Philadelphia, PA 19106 Tel. (215) 756-2424 Fax (215) 827-5758